

N.J. Facilities Which Submitted Financial Assurance Only (total - 10)

dPA I.D. No.	Name	City
NJD000314674	Onyx Division Millmaster Onyx Group	Jersey City
NJD000314682	Lyndal Chemical Division	Lyndhurst
NJD001660786	Datascope Corp.	Oakland
NJD002165371	Inmont Corp. Hawthorne Plant	Hawthorne
NJD002442549	Curtis-Wright	Fairfield
NJD002444958	Inmont Corporation	Middlesex
NJD065815771	Alcan Ingot & Powders	Union
NJD094951258	A. Gross & Company	Newark
NJD095171930	Colonial Frinting Ink Company	East Rutherford
MJD095171948	United States Printing Ink	East Rutherford



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

MAT 2 5 1983

REGION II 26 FEDERAL PLAZA NEW YORK, NEW YORK 10278

MAY 2 6 1983

Mr. George Tyler
Assistant Commissioner for
Environmental Management and Control
New Jersey Department of
Environmental Protection
Labor and Industry Building, Room 805
P.O. Box CN 402
Trenton, New Jersey 08625

Dear Mr. Tyler:

On January 31, 1983, the Environmental Protection Agency (EPA) Region II sent 302 warning letters (sample copies enclosed) to owners and operators of hazardous waste facilities which were not in compliance with EPA's financial responsibility regulations. These regulations became effective in July 1982 and required facilities to demonstrate that funds are available for:

- meeting their obligations under the Resource Conservation and Recovery Act (RCRA) for proper closure and post-closure care of their facilities (i.e., "financial assurance"); and
- ° compensating others for bodily injury or property damage caused by accidents arising from operations of the facilities (i.e., "liability insurance").

The following is to summarize industry's compliance to date (or lack thereof) with the Federal financial responsibility regulations. See the enclosed computer printout for a listing of the facilities in compliance with the Federal regulations. Also enclosed is a listing of the facilities within each non-compliance category.

- Number of facilities which have submitted all required documents (including those facilities that have utilized the financial test and corporate guarantee methods of compliance) 279
- Number of facilities which demonstrated financial assurance only

- Number of facilities which demonstrated
 liability insurance only
 28
- Number of "non-submitters" (excluding 56 facilities which either closed or requested to be declassified as hazardous waste facilities)

The above numbers indicate that 94 facilities are in violation of the Federal and State financial responsibility requirements. Our concern is whether the State or EPA should proceed with enforcement follow-up activities for these 94 facilities. The State's financial regulations, which have been in effect since October 1981, are even more stringent than the Federal regulations in that they do not provide facilities with the option of using the corporate guarantee or the financial test for demonstrating proof of financial assurance and liability insurance. and thirty facilities have utilized these alternative methods (see the enclosed computer printout for a listing of facilities which employed these methods). Now that New Jersey has received Phase I interim authorization, the State is responsible for enforcing financial regulations in lieu of EPA. However, the Phase I Memorandum of Agreement (MOA) does provide that EPA can initiate enforcement actions in cases where the State does not initiate timely and appropriate enforcement actions against violators. Regardless of which Agency takes the lead, enforcement actions must be based on the State's financial regulations (see enclosed EPA guidance on enforcement actions in authorized States)

Please notify me within the next two weeks as to the State's plan of action (including time frames) for conducting follow-up enforcement activities for the 94 facilities identified in the enclosure. (Of course, some of these facilities may have already provided the State with financial documentation pursuant to State regulations and would therefore not be considered enforcement candidates by New Jersey.) My staff and I are ready to provide assistance to New Jersey in implementing this high priority portion of the State's Phase I hazardous waste program. Alternatively, if the State chooses not to take the enforcement lead at this time, EPA is ready to proceed with initiating said enforcement actions and will keep New Jersey informed of its activities.

Your cooperation on this matter is appreciated.

Sincerely yours,

Conrad Simon

Director

Air & Waste Management Division

Enclosures

cc: Michael DeBonis

Asst. Director for Planning and Resource Recovery, NJDEP (w/o encl.)

N.J. Facilities Which Submitted No Financial Instruments (total -- 56)

EPA I.D. No.	<u>l</u> ane:	City
NJD000316778	Princeton Bionedia:	West Windsor Township
NJD000540662	Jensey Smolting & Raffining	Jersey City
NJD0G0632240	Cylinder Maintenance (or).	Kearny
NJD000692350	PNC Inc.	liutley
NJD000692467	Interchemical Petroleum Corp-	Little Ferry
NJDC00694307	Eastern Inc. Quanta Resources Corporation	Edgewater
NJD000765123	Polarome Manufacturing Co., Inc.	Newark
NJD000818518	Ames Rubber Corp, Vantage Plant	Wantage
NJD001394089	Synkote Paice Company	Elmwood Park
NJD0G1915800	James J. Kealing Inc.	Perth Amboy
NJD002008118	H & S Chemical Company Tree.	Wallington
NJD002141711	John L. Armittage & Cc.	Newark
NJD002141950	CP Chemicals Inc.	Sewaren
NJD002147643	Precision Resistin Co., Inc.	Hillside
NJD002160471	Excel Products Co., Inc.	New Brunswick
NJD002177640	C.D I Dispersions	Newark
NJD002193001	Johanson Marufacturing Corp.	Ecenton
NJD002200913	John B. Moore Corporation	South Amboy
NJD002327963	Materials Elec Pics Corp.	Trentca
NJD002344190	United States Bronce Powders	Flemington
NJD002349751	Struthers-Dunn, Inc.	Fitman
NJD002385664	Vineland Chemical	Vineland
NJD002389468	Ames Rubber Corp. Hamburg Plant	Hamburg

EPA I.D. No.	Pare	City
и.лос245.71.74	GMC New Leparture Fysit: Learnings Clark	
NCD002482545	Viking Yacht Company	New Gretna
NJ0002561652	Amax Speciality Metalia	Florham Park
NJD002561868	Drew University	Madison
NUD011728656	Keysucha Matal Pinispers, Inc.	Secaucus
NJDC12888525	Middlettown Leather Co., Inc.	Hackettstown
NUD044081222	Hurmel Chemical Company	South Plainfield
NUD044638935	Arsynco, Inc.	Carlstadt
NJD046351268	Sandvile, Ime.	Fair Lawn
NJD049544438	Diamond Aerosol Corporation	Glen Gardner
MJD0613478 60	Could Inc. Endustrial Fattery Div.	Saddle Brook
NJD067352087	Lally Industrial Granings, Inc.	Paulsboro
NJD067484923	E L Beth Ltd.	Perth Amboy
NJD068292648	Standard Tank Cleaning Corp.	Bayonne
N30076056234	BEE Chemical Services, Inc.	Pedricktown
NJ5077091569	Associated Packaging, Inc.	Hurffv:11le
NJD077549772	Ceneral Markina Transport Corp.	Bayonne .
NJP080402568	foad Building & Construction Co. Inc.	Rearmy
NJD081394741	Palumet Processing Corp. of N.J.	Sayreville
NJD087280638	Ideal Plating & Polishing Co., Inc.	Belleville
MJ9093846300.	Custom Chemicals Company	Elmwood Park
NJD094950333	Presto, Incorporated	Newark
NJDJ96876438	Tress Chemical Jourany	Newark
KJD098162704	San Juan International	Trenton .

EPA I.L. No.	<u>Name</u>	<u>City</u>
NJD9305256)3	IT Corporation	Edison
NJD980526867	Shielding Technology	Piscataway
NJD980535959	Marko Engraving & Art Corp.	Fairview
NJD980594022	E.L. Beth Ltd.	Edison
NJD980642888	Kelbro, Inc.	Camden
NJD991304148	Viking Terminal Company	Sayreville
NJT000028134	Barone Barrel & Drum Company	Paterson
NJT350011144	Exxon Bayonne Plant	3ayonne
NJT350014585	Campbell Foundry Company	Kearny

N.J. Facilities Which Submitted Liability Insurance Only (total - 28)

EPA I.D. No.	Narna	<u>City</u>
NJD0003(4732	Becton Edulinson & Company	E. Rutherford
NJD200310417	Grow Grown Inc. Devoe Marine Chatings Co.	Pennsauken
NJD 300313477	MAPPi Fracting Corp.	Old Bridge Township
NJD 000821.461	Promoceon Circuit Boards, Inc.	Trenton
NCD001392670	Hernetite Div. Mindet Endustries Inc.	Carlstadt
NCDOC1399013	Crelice Chemical Contings Inc.	Irvington
NCDC02137313	Rosson Matals Corporation	Newark
NJD002139145	Flint Ink Corporation	Lodi
NUD002151322	Fairmount Chemical Co., Inc.	Newark
NCD002153067	Prinzene Dodge i Olaota Inc.	Clifton
NJDC02155443	Cessua Aircraft	Boonton
NGDC02395382	Imgersoli-Rand Company	Phillipsburg
NCO002458342	Sun Chemical Couptrainen Pigments Div.	Newark
NUD002491116	Deptiona Plating Company	Deptford
NCD011394467	Standard T Chemical Co., Inc.	Linden
NCD042793076	Matheson Division Searle Medical Prods.	East Rutherford
NCD042797571	Rankensack Medical Center	Hackensack
NUDC44081354	Meller Chemicals, Inc.	Averiel
NUDC46356486	Kinsley's Landfill, Inc.	Deptiford
NJU047354832	Accurate Forming Corp.	Hamburg
N.10049143563	Bick Paint Manufacturers, Inc.	Jersey City
MIDD19360336	Fin-Bic Inc.	Edison
115064981989	B & L Corporation	Newark
MCT)079304783	Chay Adams Div. of Becton Dickinson & Co.	Parsippany
NJD050796732	Congoleum Resilient Flooring Div.	Trencon
NJD096873500	Co-Operative Industries	Chester
NJD990753493	Vanguard Research Assoc., Inc.	South Plainfield
NCLC67507338	Westwood Lighting Group, Inc.	Paterson

HWR-001 4/92

State of New Jersey Department of Environmental Protection and Energy Manifest Section CN 028, 401 East State Street Trenton, New Jersey 08625-0028

"Request to Deactivate EPA ID Number"

EPA ID No. NJD 095/7/930
Company Name: COATES SCREEN
Site Address: 180 EAST UNION AVE, E. RUTKERFORD (street) 07073 5E 106B (state) (zip code) (lot) (block)
Mailing Address: 63/ CENTRAL AVE CARLSTADT (street/p.o. box) (city/town) N J 07072 (state) (zip code)
Company Contact: Ronald Kwiecinski 201-933-4500 x 1356 (name) (area code and phone number)
Reasons for deactivating EPA ID No. (Check all appropriate boxes.)
 The EPA ID number was obtained for a one time cleanup which is completed. ✓ The site has completed an ECRA cleanup (indicate ECRA Case # 945/9). Other COATES SCREEN NO LONGER OWNS OR OCCUPIES This SITE. NEW OWNERS
Is the site presently occupied? (circle yes or no)
Sign and date the application below, and retain the last page (pink copy) for your records.
RONALD KWIECINSKI MM/Kunf (printed name) (signature)
(printed name) (signature) REQUEATORY MGR. (title) (date)

Submission of false information is a violation of N.J.A.C. 7:26-5.6 and N.J.A.C. 7:26-7.3.

copies: White - Manifest Section Yellow - USEPA Region II Pink - Applicant deaxt. 1-16-04 (BB)

Coates Screen

Division of Sun Chemical

631 central Avenue, Carlstadt, NJ 07072 Tel (201) 933-4500 Fax (201) 933-0261

NJDEP Manifest Section CN 028 401 East State Street Trenton, NJ 08625-0028

RE: EPA ID Number **NJD095171930**

Dear Sir or Madam,

Please find enclosed Form HWR-001 "Request to Deactivate EPA ID Number"

This site is no longer owned or occupied by Coates Screen. To the best of our knowledge, the site is now operated by.

C & W Unlimited

Contact: Mat Berliner

Tel Number: 201-933-4343
Fax Number: 201-933-5016

The Yellow copy of form HWR-001 was not sent to the EPA Region II office, on their instructions. They said that they will be notified of the action by the State Agency.

Please contact me at 201-933-4500 ext 1356 if you need additional information.

Yours Sincerely,

Ronald Kwiecinski

Regulatory Manager

Coates Screen

RCRA INSPECTION REVIEW HEET

Name of Facility - Colonial Printing Int Company
RCRA ID= -NJD095/7/930
Date of Inspection - 9-28-81
Type of Inspection: Generator Transport
Name of EPA/State Inspector -

Transporter

TSD

Al Ignnuzz.

Findings of Inspection:

Facility removes waste within.

All paper work of storage requirements are complied with.

accept for conting plan to local authorities of test meth, and sample frequency for hoste analysis plan.

Action(s) Taken: Wone

Action(s) Recommended: None.

RCRA GENERATOR INSPECTION FORM

<u>COM</u>	Edonial Printing Ink company	EPA I.D. NUMBER:	-1	e de la composition della comp	12.2 Po
COM	PANY ADDRESS:	N5 0095 171980=			
	YO EnUnion Ave. E. Rutherford, NJ,		-		
	PANY CONTACT OR OFFICIAL:	INSPECTOR'S NAME: Alphonse Ignnuzz	: 31,		
<u>TIT</u>	LE: Technical Regulatory LO-ordinator	BRANCH/ORGANIZATION:			
CHE	CK IF FACILITY IS ALSO A TSD ACILITY //	DATE OF INSPECTION:	YES	<u>NO</u>	DON'
(1)	Is there reason to believe that the fac waste on site?	ility has hazardous	X	**************************************	
-	a. If yes, what leads you to believe i Check appropriate box:	t is hazardous waste?			
	Company admits that its waste is had inspection.	zardous during the			
*	Company admitted the waste is hazard notification and/or Part A Permit A	dous in its RCRA pplication.		.•	
	// The waste material is listed in the hazardous waste from a nonspecific s	regulations as a source (§261.31)			
	The waste material is listed in the hazardous waste from a specific sour	regulations as a rce (§261.32)	*		
<u></u>	// The material or product is listed in discarded commercial chemical produc	n the regulations as a ct (§261.33)		*	
	EPA testing has shown characteristic corrosivity, reactivity or extraction or has revealed hazardous constituer analysis report)	on procedure toxicity,			
*	// Company is unsure but there is reasonaterials are hazardous (Explain)				

	The state of	b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?
		Please explain:
1 in our Mr anna	(2)	c. Identity the hazardous wastes that are on-site, and estimate approximate quantities of each. (a) I dium, settled for wash solids, sluage. (b) I dium, settled for wash solids, sluage. (c) It dium, (sigal), waste Ink flammable collector (d) Describe the activities that result in the generation of hazardous waste. (e) Scraffing collects, washing mixing tubs, (f) Cleaning of mixing tanks with solvents (g) Cleaning of mixing tanks with solvents (g) Tigments collected by air follation control device (dust collector) Is hazardous waste stored on site?
·		a. What is the longest period that it has been accumulated? Robin Miller stated athat it is not accumulated for > 90 days.
		b. Is the date when drums were placed in storage marked on
-	(3)	Has hazardous waste been shipped from this facility since November 19, 1980?
* ×		a. If "yes," approximately how many shipments were made? eleven (IP)
	(A)	Approximately how many hazardous waste shipments off site have

Does it appear from the available information that there is χ a manifest copy available for each hazardous waste shipment

been made since November 19, 1980?

If "no" or "don't know," please elaborate.

that has been made?

2

3

DON'T

KNOM

YES

NO

c. Does each manifest (or a representative sample) have the following information? a manifest document number the generator's name, mailing address, telephone number, and EPA identification number the name, and EPA identification number of each transporter the name, address and EPA identification number of the designated facility and an alternate facility, if any: a description of the wastes (DOT) the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA X Were there any hazardous wastes stored on site at the time of the inspection? If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? If not properly packaged or in secure tanks, please explain. Are containers clearly marked and labelled? d. Do any containers appear to be leaking? e. If "yes," approximately how many?

*(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

a. How do you know?

(7) Has the generator received signed copies (from the TSD don't have fort B reciept facility) of all manifests for wastes shipped off site for a manifests have more than 35 days ago?

(opy of manifest

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

E xeeption reports not necessary, facility has copies of entire manifest from TSD for a shipments when part B was not sent.

(8) General comments.

Colonial Printing Ink-company froduces specialty silk screen printing inks and related products. Edonial A does all it's manufacturing

on site and has a warehouse for on E. Union are in aspparate building.

wastes listed on notification of uco2, u107, u159, u220 and u239 are not actual wastes produced but pather raw products. wastes produced are listed as Ko86. Pot wash sludge (supernate goes to sanitary sewer), dust collector pigments, prompound paint reducing material (a flamme solvent that is reclaimed at SRS Linden, No), and tube and milprincing with flamme solvent (is disposed of at SDW wastes severy with other wastes), are wastes produced

of at SIW waste S. Kearny with other wastes), are wastes produced.

Oil soaked soil for approx, 12/x3 and 10 x 4 areas were noted next to raw product tank farm. Domestic garbage (i.e. paper, cans) were noted along Berry's creek bank and some spilled inks on asphalt were noted next to domestic garbage roll off, Mr. Halter, frod. Supervisor, stated that oil soaked gravel will be cleaned up, and placed into drums to be removed by SIW, within 1 week. The domestic paper and paint amounts of ink sludges will also be cleaned up.

Prior to use of SRS and SLW as disposal facilities colonial used All County service war wick, My in 1978 and Parto of 1979 [A 109681 (5-78)].

* The effective date for this requirement is March 1, 1982.

RCRA TREATMENT, STORAGE AND DISPOSAL FACILITY INSPECTION FORM FOR TSD FACILITIES ONLY

EPA I.D. Number:

COMPANY NAME:	EPA I.D. Number		
COMPANY ADDRESS: Inting Ink	Company NJD095	171930	
180 E. Union Ave. East Ru	thertord/115.		
COMPANY CONTACT OR OFFICIAL:	OTHER ENVIRONMENTAL F	PERMITS HELD	
Robin miller	BY FACILITY: // NPDE	ES	
mram P.	AT/ ATP	NJOEP - dust collector/ ER do discharge to sever system, do not b to do so, permit proportion	mill
TITLE:	/X/ AIK	110024	exhaust
Technical Regulatory 20-ordi	nator // OTHE	er do discharge to	systems
INSPECTOR'S NAME:	DATE OF INSPECTION:	sever system, do not 1	nauc permit
Alphone Ignouzzi Jr.	9-28-81	required.	bably is no
BRANCH/ORGANIZATION:	TIME OF DAY INSPECTION	11 200	
NJOEP	0900 his,		
(1) Is there reason to believe t waste on site?	hat the facility has ha	zardous	
TE was what loads you t	o boliovo it is bezerdo	ue wasto?	
Check appropriate box:	co believe it is hazardou	is waste:	
Company admits that its inspection.	waste is hazardous durin	ng the	
Company admitted the was		RCRA notification	
// The waste material is li hazardous waste from a n	nonspecific source (§261		
	isted in the regulations om a specific source (§2		
The material or product discarded commercial ch	is listed in the regula emical product (§261.33)	tions as a	
<pre>EPA testing has shown c corrosivity, reactivity or has revealed hazardo analysis report)</pre>	haracteristics of ignita or extraction procedure us constituents (please	toxicity,	
// Company is unsure but t materials are hazardous	here is reason`to believ . (Explain)		
		EON'T YES NO KNOW	
b. Is there reason to beli			
hazardous wastes on-sit claims are merely produ		X	
Please explain:			
c. Identify the hazardous and estimate approximate (1) 7 (55 gal) diams (1) 27 diams (55 gal) (2) Does the facility generate	of wash sludge ((4). 5 drums (55 gal). d waste from dust coll	ox pigmess
(3) Does the facility transpor		_ > _	
(4) Does the facility treat, shazardous waste?		X	
facility regist	ered as storer due	to possibility	
of storing > 90 days &	out has not done so.	,	

VISUAL OBSERVATIONS

						POILLE
(5)	SIT	E SE	CURITY (\$265.14)	YES	<u>MO</u>	KNON KNON
	a.	Is	there a 24-hour surveillance system?		X	
	b.		there a suitable barrier which completely rounds the active portion of the facility?	X		
	с.	Out	e there "Danger-Unauthorized Personnel Keep " signs posted at each entrance to the cility?		X	Will have these signs Posted withing week
(6)			ere ignitable, reactive or incompatible on site? (§265.27)	<u>X</u>		
		If	"YES", what are the approximate quantities? 43 diams (55 gal capacity). "YES", have precautions been taken to prever cidential ignition or reaction of ignitable reactive waste?	nt X	,	
		Se In	"YES", explain efarated from other wastes no smoking of outside of building your opinion, are proper precautions taken s at these wastes do not:	ny so	s igns	postel, drams
		-	generate extreme heat or pressure, fire or explosion, or violent reaction?	X	-	
*		-	produce uncontrolled toxic mists, fumes, dusts, or gases in sufficent quantities to threaten human health?	X		
		-	produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?	X		
		_	damage the structural integrity of the device or facility containing the waste?	X		
		_	threaten human health or the environment?	X		

Please explain your answers, and comment if necessary.

- e. Are there any additional precautions which you would recommend to improve hazardous waste handling procedures at the facility?
- (7) Does the facility comply with preparedness and prevention requirements including maintaining: (§265.32)

	3	YES	04	DON'T KNOW
	- an internal communications or alarm system?	X	ndf -	
	- a telephone or other device to summon emergency assistance from local authorities?	4	end -	
	- portable fire equipment?	*		
	- adequate aisle space?	X		
	- in your opinion, do the types of wastes on site require all of the above procedures, or are some not needed? Explain. all gre needed	X	adr -	
	In your opinion, do the types of wastes on site requiprocedures, or are some not needed? Explain.	ire all	of the	e above
(8)	Have you inspected to verify that the groundwater monitoring wells (if any) mentioned in the facility groundwater monitoring plan (see no. 19 below) are properly installed?	N/4		
	If you have, please comment, as appropriate.	of the land		
	The state of the s			
(9)	a. Is there any reason to believe that groundwater contamination already exists from this facility? If "YES", explain, fosibly slight contamination from oil spills on soil-gravel from Erab. Do you believe that operation of this facility may affect groundwater quality?	on of nk case	gro x	and water tructs.
	c. If "YES", explain.	T. YA		
	PROCESS THE PROPERTY OF A STATE OF THE PROCESS OF T			
	RECORDS INSPECTION			
(10) Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?	en culti- reconfi - reen al Franci	1	13
	a. If "YES", does it appear that the facility has a copy of a manifest for each hazardous waste hoad received?	//A		
	b. How many post-November 19 manifests does it have? (If the number is large, you may estimate)	NA		
	c. Does each manifest (or a representative sample) have the following information?	N/n		.0

*(8)

This requirement applies only after November 19, 1981.

- a manifest document number

		•				
		· .	/			*• **
		4	YES	0:1	EXX EXXIA	
		- the generator's name, mailing address, telephone number, and EPA identification number		~ —	-	only
		- the name, and EPA identification number of each transporter				manifest for Gen
		 the name, address and EPA identification number of the designated facility and an alternate facility, if any; 			-	Wast
		- a DOT description of the wastes			•	
*		 the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle 				
		- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA		*		2 N/4
		Are there any indications that unmanifested hazardous wastes have been received since-November 19, 1980? If YES, explain.				
(1)	l) Do pl an	hazardous wastes have been received since- November 19, 1980? If YES, explain. bes the facility have a written waste analysis an specifying test methods, sampling methods and sampling frequency? (\$265.13) Does the character of wastes handled at the facility change from day to day, week to week,	s pla	n bu	ce was	tc ot have estmeth,
	a.	Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one) Waste characteristics vary All wastes are basically the same Company treats all waste as hazardous Don't Know			Sa	mple freg,
	b.	Does hazardous waste come to this facility from off-site sources?		X		
	c.	If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?				
(1	2\ TX	SCHOOM (6265 15)				
(1		SPECTIONS (§265.15) Does the facility have a written inspection				
	. a.	schedule?	X			
	b.	Does the schedule identify the types of problems to be looked for and the frequency for inspections?	X			
	c.	Does the owner/operator record inspections in a log?	X		log si	re Kept nce 6-81 nly 1
	d.	Is there evidence that problems reported in the inspection log have not been remedied? If "YES," please explain.	77-	X		,

(13)	PER	SO:N:	NEL TRAINING (\$265.16)
	a.	Is	there written documentation of the following:
		_	job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?
•		-	type and amount of training to be given to personnel in jobs related to hazardous waste management?
		-	actual training or experience received by personnel? the facility have a written contingency plan emergency procedures designed to deal with
(14)	fo fi ha	r e res azar	the facility have a written contingency plan mergency procedures designed to deal with c, explosion or any unplanned release of dous waste? 5.51)
	a.	Do lo	pes the plan describe arrangements made with coal authorities?
	b.		as the contingency plan been submitted to local authorities?
	to c.) h	registered mail reciept of description of waste type' tackensack hospital and E. Ratherford fire & folice depts. Only oes the plan list names, addresses, and hone numbers of Emergency Coordinators?
	d.		ces the plan have a list of what emergency quipment is available?
	e.	I P	s there a provision for evacuating facility \sum
	f.	W.	as an Emergency Coordinator present or on all at the time of the inspection?
(15	5) E	oes recc	the owner/operator keep a written operating ord with: (§265.73)
	٠.	- a ar	description of wastes received with methods and dates of treatment, storage or disposal?
	-	- 10	ocation and quantity of each waste? X
	•	tr	had dates of treatment, storage or disposal? have map becation and quantity of each waste? Estailed records and results of waste analysis and results performed on wastes coming into the accility? HA In one are
		O	etailed operating summary reports and description f all emergency incidents that required the implementa- ion of the facility contingency plan? ———————————————————————————————————
*(1	.6)	pos pos	s the facility have written closure and t-closure plans? (§265.110)
		a.	Does the written closure plan include:
			- a description of how and when the facility will be partially (if applicable) and when the facility ultimately closed?

^{*} Effective date for this requirement is May 19, 1981.

well has been installed hydraulically upgradient from the limit of the waste management area?

b. Does the plan indicate that there are at least three monitoring wells installed hydraulically downgradient

at the limit of the waste management area?

[†] This section applies only to disposal facilities.

Effective date for this requirement is May 19, 1981.

SITE-SPECIFIC

please circle all appropriate activities and answer questions on indicated pages for all activities circled. When you submit your report, include only those site-specific pages that you have used.

5	STORAGE	TREATMENT	DISPOSAL
Waste	e Pile p. 9	Tank p. 8	Landfill pp. 10-11
Surfa	ace Impoundment p. 8	Surface Impoundment pp. 8-9	Land Treatment pp. 9, 10
Conta	ainer p. 7	Incineration pp. 12-13	Surface Impound- ment p. 8
Tank	, above ground p. 8	Thermal Treatment pp. 12-13	Other
Tank	, below ground p. 8	Land Treatment pp. 9-10	
Othe	r	Chemical, Physical p. 13 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	YES NO KNOW
*		Other	
18 1	<u>CO</u>	YTAINERS (\$265.170)	
1.	Are there any leaking if "YES", explain.	g containers?	
2.	Are there any contain of leaking? If "YES", explain.	ners which appear in danger	
3.	Do wastes appear commaterials?	patible with container	<u> </u>
4.	Are all containers of	closed except those in use?	<u>+ </u>
5.	Do containers appear or stored in a manne containers or cause	to be opened, handled er which may rupture the them to leak?	_ X _
6.	How often does the pontainer storage as	plant manager claim to inspect reas? Weekly	et .
7.	Does it appear that stored in close pro If "YES", explain.	incompatible wastes are bein ximity to one another?	ng <u>X</u>
		· initable or resotive	
. 8.	Are containers hold wastes located at l the facility's prop	ing ignitable or reactive . east 15 meters (50 feet) from erty line?	<u> </u>
9.	What is the approxi	mate number and size of	

55 drums with 55 gal. capacity

•)	e e e e e e e e e e e e e e e e e e e	
		. 8			
		TAIKS (§265.190)	YES	<u>C(1</u>	FOUNT DON'T
	1.	Are there any leaking tanks? If "YES", explain.			
		por eq.			
	2.	Are there any tanks which appear in danger of leaking. If "YES", explain.			
	3.	Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail?			*
		If "YES", explain.			•
	4.	Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?	~		
	5.	Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow?			
	6.	Does it appear that incompatible wastes are being stored in close proximity to one another, or in the same tank? If "YES", explain.	-		
				t	
	7.	How often does the plant manager claim to inspect container storage areas?			
	8.	Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? If "YES", explain.			
		The first of the f			
	9.	What is the approximate number and size of tanks containing hazardous wastes?			
		SURFACE IMPOUNDMENTS (§265.220)			
	1.	Is there at least 2 feet of freeboard in the impoundment?			
	2.	Do all earthen dikes have a protective cover to preserve their structural integrity? It "YES", specify type of covering.	l de		
	3	wastes are being placed in the same surface impoundment?			
		Ir "YES", explain.			



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA GENERATOR INSPECTION CHECKLIST

Gen	erator's Name: COLONIAL PRINTING INK CO.	EPA I.D. #	: <u>NJ095171</u>	930
Gen	erator's Address: 180 EAST UNION AVE.	Contact:	ROBIN MILLE	R
	E. RUTHERFORD, N.J.		NICAL COORDING	
	<u> </u>		YES	NO
1.	Does generator have an EPA I.D. number?		(₁ ✓)	()
2.	Does generator store material on-site?		(✓)	()
3.	Is waste accumulated for more than 90 days?		()	(V)
4.	Does generator manifest waste?		(√)	()
5.	Does manifest show following information:			
	a. Name, address, I.D. of generator		(√)	()
	b. Name, address, I.D. of transporter		(\sqrt)	()
	c. Name, address, I.D. of designated facility		(✓)	()
	d. Name, of alternative facility	*	()	(✓)
	e. DOT waste description		(1)	()
	f. Quantity of waste-volume, weight, number of containers		(/)	()
	g. Signed certification statement		(√)	()
6.	Does generator maintain manifest records?		(√)	()
7.	General Comments: • ADPLIED FOR PERMIT IN CASE WASTE IS ON SITE	> 00 500		
	· DULY ONE WASTE SHIPMENT SINCE NOV. 19th			montfest
	# NJ-0000199 -OK			
	401102 1 N W W			
	HOW TO SOLVE TOWN TO WAN TO SOLVE THE TOWN THE T	pected By:	RON TESTA BRIAN MOR	
	Inst ES NAL ES NA ES	Date: .	391,0S WAL	3/
	FEAMILE			

			DA	TE:	JAN 20, 1981	-			
RCR	A TR	EATMENT, STORAGE AND DISPOS	AL FACILITY	INSPECTIO	ON FORM				
COM	PANY	NAME: COLONIAL PRINTING INK	EPA I	.D. Numbe	er:				
				NJD095171	1930				
COM	PANY	ADDRESS:							
	180	EAST UNION AVE, EAST RUTHER	FORD, N.J.						
COM	PANY	CONTACT OR OFFICIAL:	OTHER ENVIR	ONMENTAL	PERMITS HELD				
	Ms.	ROBIN MILLER	BY FACILITY	: // NPD	DES				
TIT				// AIF	3				
T	ECHM	CAL REGULATORY COORDINATOR	· · · · · · · · · · · · · · · · · · ·	// OTH	IFD				
(3.)	T 1								
(1)	was	there reason to believe tha te on site?	t the facili	ty has ha	azardous				
	a.	If yes, what leads you to believe it is hazardous waste? Check appropriate box:							
	15	Company admits that its waste is hazardous during the inspection.							
		Company admitted the waste and/or Part A Permit Applı	is hazardou cation.	s in its	RCRA notificat:	ioi			
		Company is unsure but ther materials are hazardous. (e is reason Explain)	to believ	ve that waste				
			*						
					×				
		The waste material is list hazardous waste from a non							
	<u>/</u>	The waste material is list as a hazardous waste from	ed in the rea	gulations ource (§2	; 261.32)				
		The material or product is discarded commercial chemic	listed in t	he regula (§261.33)	ations as a				
		EPA testing has shown char- corrosivity, reactivity or or has revealed hazardous analysis report)	extraction	procedure	toxicity,				

DIAMA COMOCA (MY 2018

b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials? Please explain:

NO, ALL WASTES STORED IN ONE AREA

c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

KOBE - 10 30 GAL DRUMS (AIR POLLUTION CONTROL DUST)

KOBE - 80 DRUMS & 55 god/ea. (INE SLUGGE)

		YES	NO	DON'T KNOW
(2)	Does the facility generate hazardous waste?	<u>J</u>		
(3)	Does the facility <u>transport</u> hazardous waste?		<u> </u>	
(4)	Does the facility treat, store or dispose of hazardous waste? CORRENTLY STORE < 90 MYS	<u> </u>		
(5)	Has the facility received hazardous waste from an off-site source since Nov. 19, 1980 (effective date of the regulations)?	`	<u> </u>	
	a. If yes, does the facility have a copy of a manifest for each hazardous waste load received? Shipped off site	<u> </u>		

-	-3-			
		YES	NO	DON '
	- a manifest document number			
	 the generator's name, mailing address, telephone number, and EPA identification number 			
	 the name, and EPA identification number of each transporter 	_ ✓	<u>.</u>	
	 the name, address and EPA identification number of the designated facility and an alternate facility, if any; 			
	- a description of the wastes	<u> </u>		
	 the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle 	✓		
	- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regula- tions of the Department of Transportation and the EPA	· ·		
c.	Are there any indications that unmanifested hazardous wastes have been received since November 19, 1980? If yes explain		<u>/</u>	
		,		

Does the facility have a written waste analysis plan specifying test methods, sampling methods (6) and sampling trequency? (§265.13)

CONSULTANT (BURNS & ROE)

. WASTE ANALYSIS PLAN WILL BE NEEDED IF WASTE STORED > 90 DAYS.

	a.	Does the character of wastes handled at the facility change from day to day, week to week, etc., thus requiring frequent testing? (You may check more than one)		
		Waste characteristics vary		
		All waste are basically the same $\sqrt{}$		
		Company treats all waste as hazardous		
		Don't know		
		<u>YE</u>	<u>NO</u>	DON'T KNOW
	b	Does hazardous waste come to this facility from off-site sources?		
_	c	If waste comes from an off-site source, are there procedures in the plan to insure that wastes received conform to the accompanying manifest?	N/A	
•				Y
(7)	<u>S</u> :	ITE SECURITY (§265.14)		
	а	. Is there a 24 hour surveillance system?		,
	b	Is there a barrier which completely surrounds the active portion of the facility?	- <u>- </u>	
	C	• Are there "Danger-Unauthorized Personnel Keep Out" signs posted at each entrance to the facility?		

(8)	INS	PEC	TION	<u>s</u> (§265	.15))								YES	NO	2	NO KNO		
	a.	Do	es tl hedu	ne t le?	acil	ity	have	e a	wri	tter	ins	spec	tion							
	b.	pro	es thobler	ns i	nspe	ule cted	iden d and	ntif d th	y the fi	he t	ypes	s of y fo	r		✓	· <u>-</u>	19.	 		
	с.		es th a lo		wner	/ope	erato	or r	reco	rd i	nspe	ecti	ons		√	-				
(9)	PER	SONI	NEL 7	ra i	NING	(§2	265.	16)												
	a.	Is	thei	ce w	ritt	en d	docur	ment	atio	on o	f th	ne f	0110	wing	:					
_		-	rela	ated	le f to the	haza	ardou	ıs w	aste	e ma	nage	emen	acil t an b?	ity d th	e <u>/</u>	<u></u>				-
		-	pers	sonn	d am el i ent?	n jo	of obs n	tra rela	inin	ng t to	o be haza	e gi	ven us w	to aste	<u>~</u>	/			-	_
		_	acti pers	sonn	trai el. w(,	CLAI	ms -	THAT	erie נואר	ence	rec SEMG	eiv	ed by	y ~		_	_		<u> </u>	•
(10)	Are	e th sit	nere te?	ign	itab	le,			e o	c in	comp	patil	pTe A	wast	es _\	_	_			-
	a.	acc	yes, cider reac	ntia	l in	giti	on c	ons or r	beer eact	n ta cion	ken of	to j	prev itab	ent le	<u> </u>	_	_			
	b.	Ιi	t YES	5, e	xpla	in														

	c.		e proper precautions taken so that these wastes not:		NO	DON'
		-	generate extreme heat or pressure, fire or explosion, or violent reaction?	YES	<u>NO</u>	✓ ✓
		-	produce uncontrolled toxic mists, tumes, dusts, or gases in sufficent quantities to threaten human health?			<u> </u>
		-	produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions?			<u> </u>
		-	damage the structural integrity of the device or facility containing the waste?			
		-	threaten human health or the environment?			
Pleas	se e	xpl	ain your answers, if any are "NO".			
· (11)]	wou! han	there any additional precautions which you ld recommend to improve hazardous waste dling procedures at the facility?	_		
(11)	pr	eve	the facility comply with preparedness and ntion requirements including maintaining: .32)			
	- :	an	internal communications or alarm system?	$\overline{}$		
			elephone or other device to summon emergency istance from local authorities?	<u>~</u>		»
	- 1	por	table fire equipment?	<u> </u>		
	- :	ade	quate aisle space?	<u>~</u>		
(12)	em ex	erge plo	the facility have a written contingency plan fo ency procedures designed to deal with fires, sion or any unplanned release of hazardous wast .51)	/		
	a.		oes the plan describe arrangements made with ocal authorities?	<u>/</u>		

		-/-			
			YES	NO	KNOW T
	b.	Has the contingency plan been submitted to local authorities?	\checkmark		
		How do you know?			
*	c.	Does the plan list names, addresses, and phone numbers of Emergency Coordinators?	✓		
	d.	Does the plan have a list of what emergency equipment is available?	<u> </u>		-
	e.	Is there a provision for evacuating facility personnel?	<u></u>		
	f.	Was an Emergency Coordinator present or on call at the time of the inspection?	<u> </u>		
(13)		s the owner/operator keep a written operating ord with: (§265.73)	9		
`		description of wastes received with methods nd dates of treatment, storage or disposal?	<u> </u>		
- 1	- 10	ocation and quantity of each waste?	\checkmark		
(14)	moni for or	a groundwater itoring plan been submitted to the Regional A facilities containing a surface impoundment land treatment process? (This requirement de recycling facilities) (§265.90)	, land	fill	
	a.	Is there at least one monitoring well installed hydraulically upgradient from the limit of the waste management area?	N/A		
	b.	Are there at least three monitoring wells installed hydraulically downgradient at the limit of the waste management area?			
(15)		there any reason to believe that groundwater tamination exists from this facility?			
(16)		s the facility have written closure and c-closure plan? (§265.110)	V/A		

^{*} Effective date for this requirement is November 19, 1981.

		YES	NO	DON'T KNOW
		1110	110	KNOW
a.	Is there a description of how and when the facility will be partially or totally closed?			
b.	Does the written post-closure plan contain details of:			
	- groundwater monitoring activities?		✓	
	- maintenance activities?			

(17) Does the owner/operator have a written estimate of the cost of closing the facility? What is it? (§265.142)

NOT YET, BUT THEY ARE AWARE OF THE REQUIREMENT AND THE EFFECTIVE PATE.

(18) Does the owner/operator have a written estimate of the cost for post-closure monitoring and maintenance? What is it? (§265.144)

NO NOT YET

SITE-SPECIFIC

TREATMENT, STORAGE AND DISPOSAL ACTIVITY

Please circle all appropriate activities and answer questions on indicate pages for all activities circled:

STORAGE	TREATMENT	DISPOSAL
- Waste Pile pp.13-14	- Tank p.11	- Landfill pp.17-18
- Surface Impoundment p.12	- Surface Impoundment p.12	- Land Treatment pp.15-16
- Container p.10	- Incineration pp.18-19	- Surface Impound- p.12
Tank, above ground p.11	Thermal Treatment pp. 19-2	20 - Other
- Tank, below ground p.11	- Land Treatment pp.15-16	Other
	- Chemical, Physical p.21 and Biological Treatment (other than in tanks, surface impoundment or land treatment facilities)	

	CONTAINERS (§265.170)	YES	NO	DON'T KNOW
1.	Are there any leaking containers?		\checkmark	
2.	Do wastes appear compatible with container materials?			<u> </u>
3.	Are all containers closed except those in use?	$\sqrt{}$		
4.	Do containers appear to be opened, handled or stored in a manner which may rupture the containers or cause them to leak?	<u>-</u>	_/	
	If "YES", explain.			
5.	How often does the plant manager claim to inspect container storage areas?	<u> </u>		_
	DAILY			
6.	Does it appear that incompatible wastes are being stored in close proximity to one another?		\checkmark	
	If "YES", explain.			
•			^	
7.	Are containers holding ignitable or reactive wastes located at least 15 meters (50 feet) from the facility's property line?	, , , , , , , , , , , , , , , , , , ,	<u>/</u>	
8.	What is the approximate number and size of containers with hazardous wastes? on site of fine of inspection N 90 Drums a ss gal/ea (80) 2 30001/ea(10)			
9	and Labeled properly >	/ 		_

NEUTRALIZATION TANK (PERMIT BY RULE) TANKS (§265.190) DON'T DISCHARGESTO SEWER NO YES KNOW Are there any leaking tanks? Are wastes or treatment reagents being placed in tanks which could cause them to rupture, leak, corrode or otherwise fail? If "YES", explain. Do uncovered tanks have at least 2 feet N/A (CLOSED TAN of freeboard or an adequate containment structure? Where hazardous waste is continuously fed into a tank, is the tank equipped with a means to stop this inflow? NIA (BATCH PRO Does it appear that incompatible wastes are being stored in close proximity to one 5. another, or in the same tank? If "YES", explain. How often does the plant manager claim to inspect container storage areas? Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction? Explain.

8. What is the approximate number and size of tanks containing hazardous wastes?

1 TANK 2 Soogal.